

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

AARON ESPENSCHIED,
GARY IDLER, and
MICHAEL CLAY,
on behalf of themselves and a class
of employees and/or former employees
similarly situated,

Plaintiffs,

v.

Case No. 09-cv-625

DIRECTSAT USA, LLC,
and
UNITEK USA, LLC,

Defendants.

PLAINTIFFS' MOTIONS IN LIMINE VIII

NOW COME Plaintiffs Aaron Espenscheid, Gary Idler and Michael Clay, on behalf of themselves and a class of similarly situated employees, by their attorneys Gingras Cates & Luebke and Axley Brynerson, LLP, and respectfully submit the following Motion in Limine for trial.

I. Motion in Limine #8: Motion to Preclude Defendants from Introducing Evidence, Arguments or Questions Based on Documents or Other Information that Defendants Failed to Produce During Discovery.

Plaintiffs have reason to believe that Defendants may attempt to introduce evidence that was requested, but not produced, during discovery. For example, Defendants may attempt to introduce work orders that Plaintiffs requested for specific

technicians, but Defendants refused to provide. Defendants should be precluded from introducing such evidence at trial.

Dated this 6th day of May, 2011.

GINGRAS, CATES & LUEBKE

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